

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE METHYL TERTIARY BUTYL  
ETHER ("MTBE") PRODUCTS  
LIABILITY LITIGATION

Master File No. 1:00-cv-1898  
MDL 1358

This document relates to:

Case No.: 1:14-cv-6228 (DLC)

*Commonwealth of Pennsylvania v. Exxon  
Mobil Corp., et al.*, No.: 1:14-cv-06228

*Granted.*

*Denise Cote*  
*5/23/25*

**DEFENDANT GETTY PROPERTIES CORP.'S MOTION TO JOIN  
DEFENDANTS' MOTION FOR PARTIAL SUMMARY JUDGMENT  
FOR LACK OF DEFENDANT IDENTIFICATION AT FOCUS SITES**

Defendant Getty Properties Corp. hereby files this Motion to Join Defendants' Motion for Partial Summary Judgment for Lack of Defendant Identification at Focus Sites and in support states as follows:


On May 2, 2025, Defendants CITGO Petroleum Corp. and CITGO Refining & Chemicals Co. L.P. filed, on behalf of numerous Defendants, a Motion for Partial Summary Judgment for Lack of Defendant Identification at Focus Sites. *See* ECF Nos. 1075-1082. The Notice of Moving Defendants' Motion states that "Moving Defendants are identified in Exhibit 1 to the Memorandum of Law in Support" of the Motion (ECF No. 1075). Exhibit 1 to the Motion (ECF No. 1078-1), contains a list of Moving Defendants. A copy of the Notice of Moving Defendants' Motion and Exhibit "1" of the Motion are collectively attached here as Exhibit A. Defendant Getty Properties Corp. was inadvertently omitted from Exhibit A, which contains the list of Moving Defendants.

On May 12, 2025, the CITGO Defendants filed by way of correspondence to the Honorable Denise L. Cote, notice advising that Getty Properties Corp. had inadvertently been omitted from

the list of Moving Defendants. The CITGO correspondence stated “To ensure completeness of the record, Getty Properties Corp. will file a brief joinder indicating that its name should appear on Exhibit “1” of the motion alongside the other moving defendants.” The Honorable Denise L. Cote “Granted” the Letter on May 12, 2025 (ECF No. 1091). Accordingly, Defendant Getty Properties Corp. hereby moves to have its name added to the list of Moving Defendants at Exhibit 1 to Defendants’ Motion for Partial Summary Judgment for Lack of Defendant Identification at Focus Sites.

Respectfully submitted,

**RAWLE & HENDERSON** LLP



By: \_\_\_\_\_

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Dated: May 23, 2025